



Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104-2808  
+1 215 994 4000 Main  
+1 215 994 2222 Fax  
www.dechert.com

---

**STEVEN BIZAR**

Steven.Bizar@dechert.com  
+1 215 994 2205 Direct  
+1 215 655 2205 Fax

July 10, 2023

**BY ECF AND HAND DELIVERY**

Honorable Elizabeth A. Wolford  
Chief United States District Judge  
Kenneth B. Keating Federal Building  
100 State Street  
Rochester, New York 14614

**Re: *Caustic Soda Antitrust Litigation/All Indirect Purchaser Actions***

Dear Chief Judge Wolford:

We represent defendant Occidental Chemical Corporation and write on behalf of our client, the other defendants, and the indirect purchaser plaintiffs pursuant to Case Management Order No. 5 (Document 479), which requires the parties to contact Chambers to schedule a status conference immediately following the filing of any replies in support of *Daubert* motions. The parties completed *Daubert* motion briefing on June 23 and have met and conferred about next steps.

We jointly request that the Court set a status/scheduling conference for August 4 to be held immediately following completion of the class certification and *Daubert* arguments in the direct purchaser case, if the Court is available. Counsel for both the indirect purchaser plaintiffs and the defendants will be present in Rochester that day. Counsel would welcome the opportunity to discuss with the Court, *inter alia*, whether it would be helpful to hold an evidentiary hearing on the indirect purchaser plaintiffs' motion for class certification and, if so, when it should be scheduled and what form it should take. Counsel would also like to discuss the scheduling of argument on the indirect purchaser plaintiffs' motion for class certification and the parties' respective *Daubert* motions related to class certification.

Should the Court prefer to hear from the parties on a different day, counsel will make themselves available at the Court's convenience.

We all appreciate Your Honor's close attention to this matter and continued courtesy.

Respectfully yours,

s/ Steven Bizar

Steven Bizar

Cc: All Counsel of Record (via ECF)